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January 8, 2025

**VIA ECF**

The Honorable John P. Cronan  
United States District Court  
500 Pearl Street, Courtroom 12D  
New York, New York 10007

Re: *Raven Production Management Group, LLC v. Phantom Labs, Inc., et al.*,  
No. 24-cv-02670 (JPC)

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Dear Judge Cronan:

We are the attorneys for Defendant Sean Combs in the above-referenced action. We respectfully request that the Court extend the deadline for Mr. Combs to answer, move, or otherwise respond to the Complaint [Dkt. 6], which deadline is presently January 24, 2025, until twenty-one (21) days after the final resolution of the Court's Order to Show Cause, dated January 6, 2025 [Dkt. 45, the "OSC"]. Mr. Combs has not previously requested an extension of any deadline. Plaintiff consents to the requested extension.

By way of background, the Complaint was filed on April 9, 2024. Plaintiff did not serve Mr. Combs with the Complaint for the next nine months. After numerous orders from the Court, Plaintiff was ordered by the Court to file not later than December 23, 2024: (i) proof of service upon Mr. Combs and (ii) a letter proposing next steps in this litigation in light of Plaintiff's suggestion that Defendant Phantom Labs, Inc. may file for bankruptcy. [Dkt. 42.]

The filings were not made by the required date. The Court then retroactively extended the deadline for these filings to be made to January 3, 2025. [Dkt. 43.] Plaintiff filed a proof of service for Mr. Combs, but did not file the letter requested by the Court. On January 6, 2025, the Court ordered Plaintiff to show cause "why sanctions—including dismissal for failure to prosecute—should not be imposed ... ." [Dkt. 45.] Plaintiff filed the requested letter yesterday.

Mr. Combs respectfully submits that party and court resources will best be preserved by setting the deadline to answer, move, or otherwise respond to the Complaint after the order to show cause is decided. In particular, if the Court dismisses this action for failure to prosecute, then it will be unnecessary for Mr. Combs to respond to the Complaint. Thus, requiring Mr. Combs to respond to the Complaint before resolution of the order to show cause will unnecessarily waste party and likely judicial resources.

The Honorable John P. Cronan  
January 8, 2025  
Page 2

Accordingly, we respectfully request that the Court grant the requested relief. We thank the Court for its consideration of this request.

Respectfully submitted,

*/s/ Jonathan D. Davis*

Jonathan D. Davis

cc: All Counsel of Record (via ECF)